

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<b>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>HON. ROBERT B. KUGLER</b>

**NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION**

**TO: Eric Abraham, Esq.  
Hill Wallack LLP  
21 Roszel Road  
Princeton, New Jersey 08540**

*Attorneys for Defendants Hetero Labs Limited and Hetero Drugs, Limited (hereinafter  
"Defendants").*

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Ganti Jyothi, Senior Vice President of Regulatory Affairs, on May 11, 2021, at 9:00 a.m. eastern standard time, and continuing until completion, at Hill Wallack LLP, 21 Roszel Road, Princeton, New Jersey 08540, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The witness shall produce the documents requested at Exhibit A, attached hereto, at least 5 days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

**TAKING ATTORNEY FOR PLAINTIFFS:**

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The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

Dated: March 19, 2021

By: /s/ Andrés Rivero  
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*Counsel for MSP Recovery Claims,  
Series LLC*

**EXHIBIT A**

**DOCUMENT REQUESTS**

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Ganti Jyothi.
2. The complete production of Ganti Jyothi's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 19, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: /s/ Andrés Rivero  
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Series LLC*